



Mark Foti <mark@fotilaw.com>

US v. Gogolack et al., Discovery Production Letter

Mark Foti <mark@fotilaw.com>

Tue, Jun 4, 2024 at 9:43 PM

To: "Cooper, Nicholas (USANYW)" <Nicholas.Cooper@usdoj.gov>

Cc: Eric Soehnlein <eric@soehnleinlaw.com>, Jeffrey Bagley <Jeffrey_Bagley@fd.org>, George Muscato <georgemuscato@yahoo.com>, Paul Dell <pgdell.law@gmail.com>, "montroylaw@verizon.net" <montroylaw@verizon.net>, Dan Henry <DHenry@villariniandhenry.com>, Frank Bogulski <fbogulski@yahoo.com>, "Brian J. Hutchison" <bjhesq@gmail.com>, "stachlaw@aol.com" <stachlaw@aol.com>, David Cotter <dbacotter@aol.com>, "Tripi, Joseph (USANYW)" <Joseph.Tripi@usdoj.gov>, "CHALBECK, CASEY (USANYW)" <CASEY.CHALBECK@usdoj.gov>, John Morrissey <John_Morrissey@fd.org>

Hi Nick (and Joe and Casey),

I've attached a proposed protective order that was drafted with input and/or edits from the majority of attorneys. I believe that counsel for at least six of the defendants have weighed in that they would be agreeable to this protective order if it's acceptable to the Government.

It would require an Addendum identifying which items are included under the protective order. I do not speak for everyone, but I don't believe that we would have an objection to cell phone extractions being governed by the provisions of the protective order. (I also see the index references search warrants. If that includes search warrant applications, then I would expect that those would be covered as well.)

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On Wed, May 29, 2024 at 3:18 PM Cooper, Nicholas (USANYW) <Nicholas.Cooper@usdoj.gov> wrote:

[Quoted text hidden]

Proposed Protective Order.pdf
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